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March 13, 2020

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Via CM/ECF

The Honorable Kimba M. Wood United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007-1312

RE: United States v. Kozel, Case No. 19-cr-460-KMW

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MEMO ENDORSED

Dear Judge Wood:

I write respectfully to request an extension of the briefing dates on the pending Motion to Dismiss and Motion for Bill of Particulars. The parties are now in good-faith negotiations with respect to a global resolution of the issues between them, which require additional time and investigation for Defendant to analyze.

The parties are in agreement that to facilitate these discussions the briefing schedule with respect to the pending motions should be postponed, With agreement of the Government, we request that the Government's response to both motions be served by May 4, and Defendants' reply by May 25.

The parties are also in agreement that the time until May 25 shall be excludable time under the Speedy Trial Act.

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Time is excluded through May 25, 2020, pursuant to 18 U.S.C. 3161(h)(7)(A), + allow the purties to discuss a disposition. Counsel for Todd Kozel

cc: Louis Pellegrino, AUSA Olga Zverovich, AUSA

Respectfully submitted,

/s/Kendall B. Coffey

Kendall B. Coffey

N.Y., N.Y.